REMARKS

Claims 1-10, 13, 17-26, 28-37, 39-76 and 78-101 are pending in the application.

Claims 1-10, 13, 17-26, 28-37, 39-76 and 78-101 have been rejected.

Claims 1, 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85 have been amended. Support for these amendments is found, at least, at pages 26 and 40 of Applicants' Specification. No new matter is added.

Double Patenting

Claims 1-10, 13, 17-26, 28-37, 39-76 and 78-101 are provisionally rejected under the judicially created doctrine of obviousness-type double patenting as purportedly being unpatentable over claims 2, 18, 37, 46 and 55 of copending U.S. Patent Application No. 09/823,769. Since this is a provisional rejection, Applicants respectfully request that this rejection be held in abeyance until allowable subject matter is indicated in the copending application.

Claims 1-10, 13, 17-26, 28-37, 39-76 and 78-101 are provisionally rejected under the judicially created doctrine of obviousness-type double patenting as purportedly being unpatentable over claims 22-25, 27 and 31 of copending U.S. Patent Application No. 09/823,835. Since this is a provisional rejection, Applicants respectfully request that this rejection be held in abeyance until allowable subject matter is indicated in the copending application.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 1-10, 13, 17-22, 24-26, 28-37, 39-42, 45-56, 58-64, 66-76 and 78-101 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over U.S. Patent No. 6,332,154 issued to Beck, et al. ("Beck"), in view of U.S. Patent No. 7,092,509 issued to Mears, et al. ("Mears"), and further in view of U.S. Patent No. 6,718,393 issued to Aditya ("Aditya"). Applicants respectfully traverse this rejection.

Applicants respectfully submit that the proposed combination of Beck, Mears, and Aditya fails to disclose each limitation of amended independent claim 1, which reads:

1. A method comprising:
obtaining an event communicated to a communication server via an incoming communication channel of a plurality of communication channels, wherein
the communication server is communicatively coupled to the plurality of communication channels via a plurality of channel drivers,
the communication server instantiates a client object,
a channel driver of the plurality of channel drivers instantiates a driver,
the driver object instantiates a service object, wherein
the service object is specific to a first media type,
the service object communicates with the client object;
each communication channel of the communication channels has a media type,
at least two communication channels of the communication channels have different media types, and
the event corresponds to a work item available via the incoming communication channel;
providing a notification of the work item via a user interface, wherein
the user interface comprises a web browser;
receiving an activation of a work item object of the user interface, wherein
the work item object is associated with the work item,
the activation of the work item object is associated with selecting one communication channel of the plurality of communication channels, and
the work item object is activated by an agent;
identifying one or more parameters necessary for a command, wherein
the command is associated with the activation of the work item object, and
the identifying the one or more parameters comprises the communication server accessing a command parameter table;
identifying the channel driver, wherein
the channel driver is configured to execute the command,
the identifying the channel driver comprises the communication server accessing a command table, and
the command table specifies a command identifier and a channel driver; and
causing the channel driver to issue the command from the communication server to an outgoing communication channel of the communication channels.

For example, Applicants respectfully submit that the proposed combination of Beck, Mears, and Aditya fails to disclose, at least, a communications server instantiating a client object, a channel driver instantiating a driver object wherein the driver object is specific to a first media type, the driver object instantiating a service object, and the service object communicating with the client object. Support for these amendments is found, at least, at page 26 ("Driver objects 189 and service objects 183 are instantiated at

the channel driver 120, however client objects 179 are instantiated at communication server 109") and page 39 of Applicants' Specification ("The driver object is specific to the media type of communication channel 130.") The Office Action correctly admits that Beck fails to disclose identifying a channel driver. Office Action, p. 8. In fact, Beck fails to make any reference to anything remotely comparable to a channel driver. It follows that Beck fails to disclose any concept or construct in any way comparable to the claimed channel driver.

The Office Action cites Aditya as purportedly providing this missing disclosure and so, in some manner, disclosing a channel driver that is posited to be comparable to the claimed channel driver. Office Action, p. 8. The Office Action cites portions of Aditya as purportedly disclosing a communication server coupled to a plurality of communication channels via channel drivers. Office Action, p. 8. The cited portions of Aditya disclose "adaptive driver software" that is used to couple one or more physical adapters (e.g., network interface cards) to network operating system software. *See, e.g.*, Aditya 6:17-19 ("receive the data request from physical adapater 241 and…transmit a request to NOS software….")

However, even if Aditya's adaptive driver software could somehow be equated with a channel driver (a point Applicants do not concede) the cited portions of Aditya still fail to disclose an adaptive driver software, or any other component having features comparable to the claimed channel driver. That is, the cited portions of Aditya still fail to disclose the instantiation of a driver object, or that such a driver object might instantiate a service object specific to a first media type, or that such a service object communicates with a client object instantiated by a communication server, all as claimed. Not only does Aditya fail to disclose these elements, Aditya fails to disclose that such elements might somehow be made to serve any function even if the elements could somehow be included in Aditya (also points Applicants do not concede.)

In the claimed invention, communication channels can be of different media types. As disclosed in Applicants' Specification, communications channels having different media types can include different commands. Likewise, different commands can require different command parameters in order to utilize the commands in

communications between the communication channels and communication server. Accordingly, the ability to instantiate service objects wherein those service objects are specific to a given media type can be beneficial. Likewise the ability for driver objects to instantiate media type-specific service objects can be beneficial in a communications system involving communications between communications channels of multiple media types and a communication server.

By contrast, Aditya is not directed to obtaining events communicated to a communication server having communication channels of different media types, or any operation comparable thereto. Instead, Aditya is directed to load balancing using multiple channels of the same type. *See* Aditya, Abstract. Applicants respectfully submit that it is unclear what function the claimed elements could perform in Aditya's system. A multi-channel load balancing system such as that disclosed by Aditya appears to have no use for the claimed invention's features, so attempting to include such features would seem to provide no advantage to Aditya.

Applicants respectfully submit that the proposed combination of Beck, Mears, and Aditya also fails to disclose identifying one or more parameters necessary for a command wherein the identifying comprises a communication server accessing a command parameter table, as claimed. This is unsurprising since the proposed combination of Beck, Mears, and Aditya fails to make any mention of a command parameter table, or any construct comparable thereto. The Office Action cites the following portion of Aditya as purportedly disclosing a communication server accessing a command parameter table to identify one or more parameters:

> In operation, when a data packet is provided to adaptive driver software **126** for transmission, adaptive driver software **126**, based on substantially predetermined parameters, select one of server communication channels **140** for use. By choosing different server communication channels **140** for different data packets, adaptive driver software **126** achieves "load balancing", a scheme where adaptive driver software **126** operates so as to distribute the data traffic load generally equally among the server communication channels **140**.

Aditya 2:10-19 (cited at Office Action, p. 8). Applicants respectfully submit that the cited portion of Aditya is completely unrelated to determining command parameters and note

that the cited portion makes no reference whatsoever to anything remotely comparable to the claimed command parameter table, much less to a communication server accessing a command parameter table. The cited portion of Aditya merely discloses that some load balancing systems use predefined criteria to determine which communication channel to use to load balance network traffic.

Moreover, Aditya is not even directed to communications using communication channels having different media types. As such, Aditya fails to provide any suggestion that more than a single set of commands (with a single set of parameters) could be useful to communicate via Aditya's communication channels, by definition. By contrast, the claimed communications channels having different media types and utilize different, media-specific channel drivers. Having different commands and parameters, and tables to identify command parameters necessary for the commands, is useful in the context of the claimed inventions, which uses different channel drivers for communication channels having different media types. In so doing, the claimed invention provides a level of abstraction between the claimed communication server and communication channels. Thus, since Aditya would not expect to see channel drivers of different media types having different commands, Aditya would have no need for tables to identify necessary parameters for those commands. It is therefore unsurprising that Aditya fails to disclose a communication server accessing a command parameter table to identify one or more parameters necessary for a command.

Applicants respectfully submit that the proposed combination of Beck, Mears, and Aditya also fails to disclose identifying a channel driver wherein the identifying comprises a communications server accessing a command table. This too is unsurprising, since the proposed combination fails to disclose a command table, a communication server accessing such a table, or that such accessing would be in any way useful (or even relevant) to identifying a channel driver in a system composed of a combination of the teachings of Beck, Mears, and Aditya. By contrast, in the claimed system having multiple channel drivers for multiple types of media, accessing a command table that specifies a command identifier and a channel driver can be useful to identify a channel driver since the different channel drivers for different media types have different commands. Applicants respectfully submit accessing a command table would not be helpful in

Aditya's system, which discloses adaptive driver software (which the Office Action attempts to equate with the claimed channel drivers), even if such adaptive driver software could successfully be equated with the claimed channel drivers and if Aditya disclosed such a table (propositions with which Applicants respectfully disagree.)

Applicants respectfully submit that the proposed combination of Beck, Mears, and Aditya also fails to disclose that a service object provides a command and one or more command parameters to the channel driver. This follows from the fact that, as discussed above, the proposed combination of Beck, Mears, and Aditya fail to disclose a construct that is in any way comparable to the service object claimed (i.e., a service object that communicates with a client object and is instantiated by a media type-specific driver object). This also follows from the fact, also as noted above, that the proposed combination of Beck, Mears, and Aditya fails to disclose parameters comparable to those claimed (i.e., parameters necessary for a command, wherein the parameters are identified by a communication server accessing a command parameter table).

For at least the foregoing reasons, Applicants respectfully request the Examiner's reconsideration and withdrawal of the rejection of claim 1 and an indication of the allowability of same. For similar reasons Applicants request the reconsideration and withdrawal of the rejections of independent claims 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85. For at least the reason that all remaining rejected claims are dependent upon independent claims 1, 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85, Applicants request the reconsideration and withdrawal of this rejection against all remaining rejected claims.

Claims 23, 43, 44, 57 and 65 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over Beck, Mears and Aditya, further in view of U.S. Patent No. 6,587,556 issued to Judkins, et al. ("Judkins"). Applicants respectfully traverse this rejection. Claims 23, 43, 44, and 57 and 65 depend, respectively, upon allowable base claims 2, 39, 54, and 59. Therefore, Applicants respectfully assert that these claims are likewise allowable, at least by virtue of depending from allowable base claims.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

/Shawn Doman/

Shawn Doman
Attorney for Applicants
Reg. No. 60,362
Telephone: (512) 439-5092
Facsimile: (512) 439-5099